



114. While Bobby Ray Dixon was held at the Forrest County Regional Jail Complex, Defendants Joe Hopstein, Henry “Red” Brown, and Raymond Howell, among others, repeatedly took Mr. Dixon from his cell.

115. Defendants Hopstein, Brown, and Howell, among others, repeatedly beat Mr. Dixon.

116. As members of the Task Force or officers directly assisting it and following the pattern of their conduct with Larry Ruffin, Deputies Brown, Hopstein, and Howell, among others, participated in the persistent physical and verbal abuse of Mr. Dixon and the crowding, swarming, and cajoling insistence that Mr. Dixon assisted Mr. Ruffin and a third man Phillip Bivens in the rape and murder of E.P.

117. After an extended period of confusing and escalating coercive treatment, members of the Task Force or officers directly assisting it—specifically including Defendants Hopstein, Brown, and Howell, among others—overbore Mr. Dixon’s will and he acquiesced.

**DEFENDANTS BRAG ABOUT BEATING LARRY RUFFIN**

**AND BOBBY RAY DIXON INTO CONFESSING**

118. After beating Larry Ruffin, Defendants Hopstein, Brown, Howell, and the other deputies would assemble in the jail’s control room. As they lounged about the room, Hopstein, Brown, Howell, and the others would openly brag to each other and to the other deputies and supervisors, including Sheriff Walters, about the beatings they had administered to Larry Ruffin in an effort to coerce a confession from him.

119. Similarly, after beating Bobby Ray Dixon, Defendants Hopstein, Brown, Howell, and the other deputies would assemble in the jail’s control room. As they lounged about the room, Hopstein, Brown, Howell, and the others would openly brag to each other and to the other

deputies and supervisors, including Sheriff Walters, about the beatings they had administered to Bobby Ray Dixon in an effort to coerce a confession from him.

120. As trustees, some of the jail's inmates were allowed to move more freely around the jail. At times, trustees were present in the control room when the deputies, including Hopstein, Brown, and Howell, talked and bragged about the things they had done to jail inmates and suspects.

121. Specifically, trustees were present on a number of occasions when Hopstein, Brown, Howell, and other deputies bragged about beating Larry Ruffin and Bobby Ray Dixon in an effort to coerce a confession from each man.

122. After Hopstein, Brown, Howell, and the other deputies bragged about beating Ruffin and Dixon, they warned the trustees not to tell anyone what Defendants had just admitted: that the trustees had heard and seen nothing and that they needed to keep their mouths shut.

123. On other occasions, deputies, including Hopstein, Brown, and Howell, beat other inmates and suspects to coerce confessions from them—sometimes in the control room and sometimes in Sheriff Walters' office—and bragged in the control room about beatings they administered to jail inmates and suspects.

124. On more than one occasion, Sheriff Walters was present when his deputies, including Hopstein, Brown, and Howell, beat, threatened, and physically coerced jail inmates and suspects in the jail complex.

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New York, NY

Respectfully submitted,

/s/ Anna Benvenuti Hoffmann

Anna Benvenuti Hoffmann

Peter Neufeld

Nick Brustin

NEUFELD SCHECK & BRUSTIN, LLP

99 Hudson Street, 8<sup>th</sup> Floor  
New York, NY 10013  
Telephone: (212) 965-9081  
Fax: (212) 965-9084  
Email: anna@nsbcivilrights.com  
*LEAD COUNSEL*

/s/ William G. Beck  
William G. Beck  
Michael Abrams  
Clay Britton  
LATHROP & GAGE LLP  
2345 Grand Boulevard, Suite 2800  
Kansas City, MO 64108  
Telephone: (816) 460-5811  
Fax: (816) 292-2001  
Email: WBeck@lathropgage.com

/s/ Suzanne Keys  
Suzanne Keys MSB # 5032  
Ratoya Gilmer MSB # 104487  
PRECIOUS MARTIN, SR. & ASSOCIATES,  
PLLC  
821 North Congress Street  
Jackson, MS 39202  
Telephone: (601) 944-1447  
Fax: (601) 944-1448  
Email: skeys@ptmandassoc.com

***Attorneys for Plaintiffs Phillip Bivens, the Estate  
of Larry Ruffin, the Estate of Bobby Ray Dixon,  
Laturas Smith, and Carrie Strong***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of Plaintiffs' Supplement to the Rule 7(a) *Schultea* Reply was served *via* ECF on November 10, 2014 upon all parties who have appeared on ECF.

/s/ Anna Benvenuti Hoffmann

Anna Benvenuti Hoffmann